

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WING SHING PRODUCTS (BVI) LTD., *

Plaintiff, *

v. *

CIVIL ACTION: 01 CIV. 1044(RJH)
(Hon. Richard J. Holwell)

SIMATELEX MANUFACTURING
COMPANY, LTD., *

Defendant. *

**INITIAL DISCLOSURES OF SIMATELEX
MANUFACTORY COMPANY, LTD.
UNDER RULE 26(A)**

Simatelex Manufactory Company, Ltd. (Simatelex) provides the following information in accordance with *Rule 26(A), Federal Rules of Civil Procedure*:

1. The following individuals may have discoverable knowledge relating to the issues in this case:
 - (a) Ms. Fung Kuen Lam, Simatelex, Hong Kong. Ms. Lam is familiar with the sales and marketing issues regarding this product.
 - (b) Mr. Sin Nam Woo, Simatelex, Hong Kong. Mr. Woo is familiar with the manufacturing issues relating to this product.
 - (c) Counsel for Simatelex is presently making efforts to determine if there are other Simatelex witnesses and will supplement these disclosures if other witnesses are identified.

- (d) John C. K. Sham
21/F Citicorp Centre
18 Whitefield Rd.
Causeway Bay, Hong Kong
- (e) Sunbeam Corporation
2381 Northwest Executive Center Drive
Boca Raton, FL 33431

2. Documents relevant to the issues in this case, and on which Simatelex may rely in support of its defense:

- (a) Counsel for Simatelex is presently attempting to determine, in addition to the agreements between Simatelex and Sunbeam dated February 26, 2000, March 13, 2000, and June 19, 2000, which were exhibits to Simatelex's previously filed motion to dismiss, what, if any, other documents at Simatelex are relevant to the issues in this case and discoverable. As soon as that information is obtained, this disclosure will be supplemented.



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CERTIFICATE OF SERVICE

I hereby certify that I have this 23rd day of August, 2004, served a copy of these Rule 26(A) disclosures on the counsel whose names are listed below by facsimile and by placing a copy in the United States mail, properly addressed and postage prepaid.


ORRIN K. AMES, III

COUNSEL OF RECORD:

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